

THE HONORABLE BRIAN D. LYNCH
Chapter 7

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re:

SUSAN FAYE DONES

Debtor.

Bankruptcy No. 10-45608-BDL

Adversary No. 10-04338-BDL

NXIVM CORPORATION, a Delaware
corporation,

Plaintiff,

**PLAINTIFF NXIVM
CORPORATION'S
SUPPLEMENTAL DISCLOSURES
PURSUANT TO FRCP 26(a)(1) AND
BR 7026**

vs.

SUSAN FAYE DONES
Defendant.

Adversary No. 10-04339-BDL

NXIVM CORPORATION, a Delaware
corporation,

Plaintiff,

vs.

KIM MARIE WOOLHOUSE
Defendant.

NXIVM SUPPLEMENTAL DISCLOSURES - 1

1 Plaintiff NXIVM Corporation ("NXIVM") provides the following supplemental
 2 disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and BR 7026. NXIVM reserves the right to
 3 amend and supplement these initial disclosures as necessary or appropriate.

4 **A. Individuals Likely to Have Discoverable Information.**

5 The following individuals are likely to have discoverable information that NXIVM
 6 may use to support its claims in this case:

| 7 8 9 10 11 12 | Witness Name | Address/Phone | Information/Knowledge |
|--|-----------------|--|---|
| 13 14 15 16 17 18 19 | Joyce Anastasia | 3 El Quanito Way Burlingame, CA 94010-6025 May have a separate apartment at: 503 Pineo Ave #2 Mill Valley, CA 94941-3703 | Upon information and belief, Joyce Anastasia is an advisor to the "NXIVM 9" and is knowledgeable about the history leading up to this dispute; and Dones' and Woolhouse's conspiratorial scheme to maliciously and willfully damage NXIVM's business reputation and prospects. |
| 20 21 22 23 24 25 26 | Geoff Johnson | 7076 NE 163 rd St Kenmore, WA 98028 425-482-2077 206-463-3930 | Upon information and belief, Geoff Johnson was a member of NXIVM's Tacoma Center and is knowledgeable about the history leading up to this dispute; NXIVM's procedures for keeping information confidential and proprietary, the value of NXIVM's confidential and proprietary business information and teaching methods; and Dones' and Woolhouse's conspiratorial scheme to maliciously and willfully damage NXIVM's business reputation and prospects. |
| | Andrew Dallow | 38303 62 nd Ave Ct Eatonville, WA 98328-9229 | Upon information and belief, Andrew Dallow was a member of NXIVM's Tacoma Center and is knowledgeable about the history leading up to this dispute; NXIVM's procedures for keeping information confidential and proprietary, the value of NXIVM's confidential and proprietary business information and teaching methods; and Dones' and Woolhouse's conspiratorial scheme to maliciously and willfully damage NXIVM's business reputation and prospects. |

NXIVM SUPPLEMENTAL DISCLOSURES - 2

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|------------------|---|--|
| 1 Peter Skolnick | 65 Livingston Avenue Roseland, New Jersey 07068 973-597-2500 | On information and belief, Peter Skolnick is an attorney in New Jersey and is knowledgeable about whether he is improperly advising Dones and Woolhouse in the above-captioned proceedings and thereby engaging in the unauthorized practice of law. |
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5 In addition to the above, NXIVM reserves the right to call any witness identified by
6 any other party, and to call any other witnesses identified pursuant to further investigation
7 and ongoing discovery.
8

9 DATED: May 10, 2011.

10 LANE POWELL PC

11
12 By /s/Tiffany Scott

Paul D. Swanson, WSBA No. 13656

Tiffany Scott, WSBA No. 41740

Attorneys for NXIVM Corporation

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14 Robert D. Crockett, admitted *pro hac vice*

Latham & Watkins, LLP

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Los Angeles, CA 90071-1560

15
16 Richard H. Weiskopf, admitted *pro hac vice*

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Albany, NY 12207

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26 NXIVM SUPPLEMENTAL DISCLOSURES - 3

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2011, I caused to be served a copy of the foregoing
PLAINTIFF NXIVM CORPORATION'S SUPPLEMENTAL DISCLOSURES on the
 following person(s) in the manner indicated below at the following address(es):

| | |
|--|--|
| Susan Faye Dones 616 9 th Avenue SW Puyallup, WA 98271 Email: call2action@msn.com | <input type="checkbox"/> by CM/ECF <input checked="" type="checkbox"/> by Electronic Mail <input type="checkbox"/> by Facsimile Transmission <input checked="" type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery |
| Kim Marie Woolhouse 616 9 th Avenue SW Puyallup, WA 98271 Email: <u>kimwoolhouse@msn.com</u> | <input type="checkbox"/> by CM/ECF <input checked="" type="checkbox"/> by Electronic Mail <input type="checkbox"/> by Facsimile Transmission <input checked="" type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery |
| Richard H. Weiskopf O'Connell & Aronowitz PC 54 State Street Albany, NY 12207 rweiskopf@Oala.com | <input type="checkbox"/> by CM/ECF <input checked="" type="checkbox"/> by Electronic Mail <input type="checkbox"/> by Facsimile Transmission <input type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery |
| Robert D. Crockett Latham & Watkins, LLP 355 S. Grand Avenue Los Angeles, CA 90071-1560 <u>Bob.crockett@lw.com</u> | <input type="checkbox"/> by CM/ECF <input checked="" type="checkbox"/> by Electronic Mail <input type="checkbox"/> by Facsimile Transmission <input type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery |

/s/Julie Kelly
 Julie Kelly

NXIVM SUPPLEMENTAL DISCLOSURES - 4